

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LADY MAAKIA CHARLENE SMITH,)	
personal representative of the Estate of BILAL)	
HASANIE HILL, deceased,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 4:20-CV-00804-JMB
ADVANCED CORRECTIONAL)	
HEALTHCARE, INC.; DR. ARTHUR)	
BENTLEY, Individually and in His Official)	
Capacity as a Medical Services Provider at)	
Phelps County; DIONNE KELLEY; KELLY)	
RATCLIFF, LIEUTENANT JOE TAYLOR;)	
DR. TRAVIS SCHAMBER,)	
)	
Defendants.)	

**PLAINTIFF’S MOTION FOR AWARD OF ATTORNEYS’ FEES, COSTS,
AND POST-JUDGMENT INTEREST**

COMES NOW plaintiff Lady Maakia Charlene Smith (“Plaintiff”), by and through her undersigned counsel, and hereby submits this Motion for Attorneys’ Fees pursuant to the Federal Rules of Civil Procedure, Rules 54(d)(1) and (2), Local Rules of Court 8.02 and 8.03, 42 U.S.C. §§ 1983 and 1988, *et seq.*, Litigation Costs and Expenses pursuant to 28 U.S.C. §§ 1920 *et seq.* and demands reasonable attorneys’ fees in the amount of **\$1,595,544.40** plus reasonable costs and expenses in the amount of **\$63,323.06**.

Finally, pursuant to 28 U.S.C. §§ 1961 *et seq.*, Plaintiff demands post-judgment interest at a rate of 2.11% until the fees and costs are paid in full.

Submitted contemporaneously with this motion is Plaintiff’s Memorandum in Support of this Motion and supporting documentation, including but not limited to Plaintiff’s expert’s affidavit concerning the reasonableness of fees.

WHEREFORE, Plaintiff respectfully requests the aforementioned attorneys' fees, costs, and post-judgment interest be awarded to Plaintiff. Plaintiff further requests such other and further relief as this Court deems just and proper.

Date: June 16, 2022

Respectfully Submitted,

/s/ Charles C. Eblen

Charles C. Eblen, #55166

Brandon K. Gutshall, #61848

Lindsey K. Heinz, #61775

SHOOK, HARDY & BACON L.L.P.

2555 Grand Boulevard

Kansas City, MO 64108-2613

Telephone: 816-474-6550

Facsimile: 816-421-5547

ceblen@shb.com

bgutshall@shb.com

lhein@shb.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 16, 2022, a copy of **PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS, AND POST-JUDGMENT INTEREST** was filed via the Court's CM/ECF system, which generated a notice of electronic filing with links to true and correct copies of the foregoing document for service upon the following counsel of record:

J. Thaddeus Eckenrode
Lisa H. Howe
ECKENRODE MAUPIN
11477 Olde Cabin Rd.
Suite 110
St. Louis, MO 63141
314-726-6670
Fax: 314-726-2106
jte@eckenrode-law.com
lh@eckenrode-law.com

**ATTORNEY FOR DEFENDANTS DR. ARTHUR BENTLEY,
DIONNE KELLEY, AND ADVANCED CORRECTIONAL HEALTHCARE, INC.**

/s/ Charles C. Eblen

Charles C. Eblen